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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056609
Party	Plaintiff Comvita Limited
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Submission	Other Motions/Papers
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Date	03/21/2014
Attachments	3-21-14 Joint Motion.pdf(65625 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

COMVITA LIMITED,)	
)	
Petitioner;)	Cancellation No.92/056,609
)	
)	Mark: MANUKALOEZENGES
)	Registration No. 4,211,756
v.)	Registered: September 18, 2012
)	
)	Mark: MANUKACAPS
)	Registration No. 4,211,757
MANUKAMED LIMITED,)	Registered: September 18, 2012
)	
)	Mark: MANUKABALM
)	Registration No. 4,211,761
Respondent.)	Registered: September 18, 2012
)	

JOINT MOTION TO SUSPEND PROCEEDINGS AND RESET DATES

Petitioner Comvita Limited and Respondent ManukaMed Ltd. jointly request a further 60-day suspension of the proceedings to allow the parties additional time to continue their positive settlement efforts

The suspension is requested so that the Parties can continue to discuss settlement of this cancellation action. In compliance with the Board's January 30, 2014 Order, the Parties present the following report on progress of the ongoing settlement negotiations.

The Parties have exchanged settlement proposals and are continuing to discuss certain parameters and conditions related to Respondent's continued ownership of the registrations and the Parties' respective rights, and other issues that bear on the nature and scope of the settlement agreement. On December 18, 2013, Petitioner sent

Respondent a written proposal for settlement. Respondent provided a written response on February 18, 2014, to which a reply was sent by Respondent on March 20, 2014. The parties have reached agreement on several terms and Respondent is reviewing an additional proposal by Petitioner. The parties expect to reach a final resolution by May 20, 2014.

The parties therefore request a suspension of this proceeding until May 20, 2014, and a corresponding reset of discovery and testimony dates, to allow the Parties to continue their settlement efforts.

Given the information set forth above and the fact that the Parties are diligently working towards a settlement, the Parties request that the deadlines for the initial disclosures, the expert disclosures, and all subsequent deadlines be reset as follows:

Time to Answer:	CLOSED
Deadline for Discovery Conference:	CLOSED
Discovery Opens:	CLOSED
Initial Disclosures Due:	5/20/2014
Expert Disclosures Due:	9/17/2014
Discovery Closes:	10/17/2014
Petitioner's Pretrial Disclosures Due:	12/1/2014
Petitioner's 30-day Trial Period Ends:	1/15/2014
Respondent's Pretrial Disclosures Due:	1/30/2015
Respondent's 30-day Trial Period Ends:	3/16/2015
Petitioner's Rebuttal Disclosures Due:	3/31/2015
Petitioner's 15-day Rebuttal Period Ends:	4/30/2015

In the alternative, if the Board denies the Joint Motion for Suspension, then the Parties request that the Board extend the discovery period for a reasonable time as it deems fit.

Respectfully submitted,

KIM WINSTON LLP

Dated: March 21, 2014

By /Laura J. Winston/
Laura J. Winston

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Motion to Suspend Proceedings and Reset Dates has been served on Respondent ManukaMed Limited at its email address of record this 21st day of March, 2014.

/Laura J. Winston/

Laura J. Winston